

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD SNOWDEN,

Defendant,

and

MACMILLAN PUBLISHING GROUP, LLC
d/b/a HENRY HOLT AND COMPANY, *et al.*,

Relief-Defendants.

Case No. 1:19-cv-1197-LO-TCB

**CONSENT MOTION FOR EXTENSION OF TIME FOR RELIEF-DEFENDANT
MACMILLAN PUBLISHING GROUP, LLC TO FILE
ANSWER TO AMENDED COMPLAINT AND WAIVER OF HEARING**

Relief-Defendant Macmillan Publishing Group, LLC d/b/a Henry Holt and Company (“Macmillan”), by and through undersigned counsel, hereby respectfully moves for an order extending Macmillan’s time to file an Answer or other responsive pleading to the Amended Complaint in this case (ECF No. 15) to and including November 20, 2019, in order to allow sufficient time to verify certain additional information for inclusion in Macmillan’s Answer. Plaintiff United States of America (“Plaintiff”) consents to this relief. A hearing on this motion is hereby waived.

Pursuant to Fed. R. Civ. P. 4(d) and the waiver of service dated September 17, 2019 (signed by Macmillan on September 20, 2019) (*see* ECF No. 11), the original deadline for Macmillan to file an Answer to the Amended Complaint is November 18, 2019. No other

pending deadlines in this case will be affected by this extension. Plaintiff and Macmillan have further agreed that in agreeing to so extend the time to respond to the Amended Complaint by two days, neither Plaintiff nor Macmillan waive any right, claim, or defense related to this litigation.

Accordingly, Macmillan respectfully moves the Court to enter an order so extending the deadline as set forth in the Proposed Order that is being filed concurrently herewith.

DATED: November 18, 2019

Respectfully Submitted,

/s/

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*Attorneys for Relief-Defendant Macmillan
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Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all parties who have appeared in this action.

Respectfully Submitted,

/s/

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